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# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Debtor.

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In re : Chapter 11 Case No.

LEXINGTON PRECISION CORPORATION, : 08- 11153

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# NOTICE OF AMENDED AGENDA OF MATTERS SCHEDULED FOR HEARING ON OCTOBER 6, 2009 AT 2:00 P.M. (HEARING ADJOURNED TO A DATE TO BE DETERMINED)

PLEASE NOTE THAT DUE TO THE REASSIGNMENT OF THE ABOVE REFERENCED CASES TO THE HONORABLE BURTON R. LIFLAND, THE HEARING SCHEDULED FOR OCTOBER 6, 2009 AT 2:00 P.M. HAS BEEN ADJOURNED TO A DATE TO BE DETERMINED.

#### I. <u>CONTESTED MATTERS</u>

1. Prepetition Secured Lenders' Motion to (I) Approve the Proposed Disclosure Statement, (II) Approve the Procedures to Solicit Acceptances of the Prepetition Secured Lenders' Proposed Plans and (III) Schedule a Hearing and Establish Notice and Objection Procedures for Confirmation of Prepetition Secured Lenders' Proposed Plans [Docket No. 698]

Response Deadline: October 1, 2009

#### Responses Received:

A. DIP Lenders Objection to Prepetition Lenders Proposed Combined Disclosure Statement and Limited Objection to Official Committee of

- Unsecured Creditors Proposed Second Amended Disclosure Statement [Docket No. 733]
- B. Debtors' Objection to the Proposed Amended Disclosure Statement for Official Committee of Unsecured Creditors' Amended Joint Chapter 11 Plan and Proposed Disclosure Statement for the Prepetition Secured Lenders' Chapter 11 Plans [Docket No. 735]
- C. Liberty Mutual Insurance Company's Objection to Prepetition Secured Lenders' Motion to Approve the Proposed Disclosure Statement [Docket No. 738]

#### **Additional Documents**

- A. Proposed Combined Disclosure Statement Regarding Prepetition Secured Lenders' Chapter 11 Plans for Lexington Rubber Group, Inc. and Lexington Precision Corporation [Docket No. 695]
- B. Chapter 11 Plan of Prepetition Secured Lenders' as to Debtor Lexington Precision Corporation [Docket No. 696]
- C. Chapter 11 Plan of Prepetition Secured Lenders' as to Debtor Lexington Rubber Group, Inc. [Docket No. 697]
- D. Corrected Notice of Hearing of PrePetition Secured Lenders' Motion to (I) Approve the PrePeition Secured Lenders' Proposed Disclosure Statement, (II) Approve the Procedures to Solicit Acceptances of the PrePetition Secured Lenders' Proposed Plans, and (III) Schedule a Hearing and Establish Notice and Objection Procedures for Confirmation of the PrePetition Secured Lenders' Proposed Plans [Docket No. 705]
- E. Notice of Corrected Exhibit B to the Prepetition Secured Lenders' Motion to (I) Approve the Proposed Disclosure Statement, (II) Approve the Procedures to Solicit Acceptances of the Prepetition Secured Lenders' Proposed Plans and (III) Schedule a Hearing and Establish Notice and Objection Procedures for Confirmation of Prepetition Secured Lenders' Proposed Plan [Docket No. 716]

Responsible Counsel: Carter, Ledyard & Milburn LLP and Waller, Lansden Dortch & Davis

Status: This matter has been adjourned to a date to be determined.

2. Official Committee of Unsecured Creditors' Motion for Order (i) Approving Proposed Disclosure Statement in Respect of Committees Joint Chapter 11 Plan for the Debtors, (ii) Approving Solicitation Procedures and (iii) Setting a Hearing and Establishing Notice and Objection Procedures for Confirmation [Docket No. 710]

Response Deadline: October 1, 2009

# Responses Received:

- A. DIP Lenders Objection to Prepetition Lenders Proposed Combined Disclosure Statement and Limited Objection to Official Committee of Unsecured Creditors Proposed Second Amended Disclosure Statement [Docket No. 733]
- B. Debtors' Objection to the Proposed Amended Disclosure Statement for Official Committee of Unsecured Creditors' Amended Joint Chapter 11 Plan and Proposed Disclosure Statement for the Prepetition Secured Lenders' Chapter 11 Plans [Docket No. 735]
- C. Objection of Agents for Prepetition Secured Lenders to Committee's Motion for Approval of Disclosure Statement. Solicitation Procedures, and Confirmation Procedures [Docket No. 737]

# **Additional Documents:**

- A. Official Committee of Unsecured Creditors' [Proposed] Joint Chapter 11 Plan [Docket No. 708]
- B. [Proposed] Disclosure Statement for Official Committee of Unsecured Creditors' Joint Chapter 11 Plan [Docket No. 709]
- C. Notice of Hearing to Consider Official Committee of Unsecured Creditors Motion for Order (I) Approving Proposed Disclosure Statement in Respect of Committees Joint Chapter 11 Plan for the Debtors, (II) Approving Solicitation Procedures, and (III) Setting Hearing and Establishing Notice and Objection Procedures for Confirmation [Docket No. 711]
- D. Official Committee of Unsecured Creditors' [Proposed] Amended Joint Chapter 11 Plan [Docket No. 724]
- E. [Proposed] Amended Disclosure Statement for Official Committee of Unsecured Creditors' [Proposed] Amended Joint Chapter 11 Plan [Docket No. 726]
- F. Notice of Filing of Official Committee of Unsecured Creditors' (i)
  Proposed Amended Joint Chapter 11 Plan for the Debtors and (ii)
  Proposed Amended Disclosure Statement in Respect of the Official
  Committee of Unsecured Creditors' Chapter 11 Plan for the Debtors
  [Docket No. 727]
- G. [Proposed] Second Amended Disclosure Statement for Official Committee of Unsecured Creditors' [Proposed] Amended Joint Chapter 11 Plan [Docket No. 728]

- H. Notice of Filing of Official Committee of Unsecured Creditors' Proposed Second Amended Disclosure Statement in Respect of the Committee's Proposed Amended Joint Chapter 11 Plan for the Debtors [Docket No. 729]
- I. Notice of Filing of Amended Exhibit 1.68 to Official Committee of Unsecured Creditors' Proposed Amended Joint Chapter 11 Plan for the Debtors [Docket No. 730]

Responsible Counsel: Andrews Kurth LLP

Status: This matter has been adjourned to a date to be determined.

3. Motion by Agents to the Prepetition Secured Lenders to Set Aside Certain Standstill Agreements to Permit Gordian Group to Solicit Interest in Potential Sales of the Debtors' Business Units and/or Assets, and for Related Relief [Docket No. 718]

Response Deadline: October 1, 2009

# Responses Received:

- A. Objection of the Official Committee of Unsecured Creditors' to Motion by Agents to the Prepetition Secured Lenders to Set Aside Certain Standstill Agreements to Permit Gordian Group to Solicit Interest in Potential Sales of the Debtors' Business Units and/or Assets, and for Related Relief [Docket No. 734]
- B. Debtors' Objection to the Motion by Agents to the Prepetition Secured Lenders to Set Aside Certain Standstill Agreements, to Permit Gordian Group to Solicit Interest in Potential Sales of the Debtors' Business Units and/or Assets, and for Related Relief [Docket No. 736]

#### Additional Documents:

A. Notice of Hearing of Prepetition Secured Lenders' Motion Set Aside Certain Standstill Agreements. to Permit Gordian Group to Solicit Interest in Potential Sales of the Debtor's Business Units and/or Assets, and for Related Relief [Docket No. 719]

Responsible Counsel: Carter, Ledyard & Milburn LLP and Waller, Lansden Dortch & Davis

**Status:** This matter has been adjourned to a date to be determined.

Dated: October 5, 2009 New York, New York

/s/ Adam P. Strochak

Richard P. Krasnow Adam P. Strochak

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